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Resilient or adaptable Islam?

Multiculturalism, religion and migrants' claims-making for group demands in Britain, the Netherlands and France

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ABSTRACT This article investigates multiculturalism by examining the relationship between migrants' group demands and liberal states' policies for politically accommodating cultural and religious difference. It focuses especially on Islam. The empirical research compares migrants' claims-making for group demands in countries with different traditions for granting recognition to migrants' cultural difference – Britain, France and the Netherlands. Overall, we find very modest levels of group demands indicating that the challenge of group demands to liberal democracies is quantitatively less than the impression given by much multicultural literature. Group demands turn out to be significant only for Muslims, which holds across different countries. Qualitative analysis reveals problematic relationships between Islam and the state, in the overtly multicultural Dutch approach, within British race relations, and French civic universalism. This implies that there is no easy blueprint for politically accommodating Islam, whose public and religious nature makes it especially resilient to political adaptation.

KEYWORDS community cohesion ● ethnic minorities ● integration ● Muslims

INTRODUCTION

A few years ago, some authors thought that western liberal democracies would push decisively for policies that deliberately and explicitly recognized and protected migrants as distinct ethnic groups (e.g. Kymlicka, 1995). After 9/11, a fractious Gulf War, and the 2004 Madrid outrage, the mantra 'we are all multiculturalists now' (Glazer, 1997) has less salience, both as normative rhetoric and as a policy option. Such shifts away from multiculturalism were arguably already occurring. The most overt European experiment in multiculturalism, in the Netherlands, had already switched from special policies for migrant groups to policies for individual migrants within society (Entzinger, 2003). Similar changes were discernible in Sweden (Soininen, 1999), and more recently, republican-style citizenship rituals were introduced in Britain (Statham, 2003). Even brief French flirtations with differentialism, admittedly symbolic, suffered an early death (Brubaker, 2003). Instead of celebrating diversity, assimilative cultural demands – language skills, knowledge of national culture, citizenship rituals – are the requirements for migrants in recent policy thinking.

In the sizeable theoretical literature on the subject, there has been a strong preoccupation with the position of ethnic minorities and the – beneficial or harmful – effects of 'multiculturalism', the extension of cultural group recognition and rights to minorities (e.g. Habermas, 1994; Taylor, 1994). At stake in such discussions is the nation state's capacity for maintaining social cohesion as well as the liberal conception of individual rights on which it rests. Problems are seen to arise from the increasing demands that are put forward by migrant minorities for special group rights, recognition, exemption from duties, and support from the state for their cultural identities. These group demands challenge the concept of a unified, undifferentiated citizenship, a development that is viewed by supporters of multiculturalism (e.g. Parekh, 1996; Young, 1998) as a healthy antidote against the prevalent 'white' cultural hegemony, and by opponents (e.g. Schlesinger, 1998; Huntington, 2002) as a serious assault on the shared communal values and solidarity necessary for cohesion and integration. Proponents and opponents agree that such trends are widespread and deep at the heart of contemporary societies, presenting, in Kymlicka's (1995: 1) words, 'the greatest challenge' to the liberal nation state.

Following the high-profile Rushdie and Headscarf controversies in Britain and France respectively, and given the centrality of Islam to Europe's multicultural debates, it is surprising that discussions about religion have often tended to be subsumed under those about other expressions of cultural diversity. We consider that religion is an important form of cultural expression and ought to be given specific consideration. So does Charles Taylor, who refers to Islam specifically to exclude it from his

politics of recognition because (1994: 62) '[f]or mainstream Islam, there is no question of separating politics and religion . . . as many Muslims are well aware, western liberalism is not so much an expression of the secular, postreligious outlook that happens to be popular among liberal *intellectuals* as a more organic outgrowth of Christianity'. Against this, Tariq Modood, argues that Muslims' claims are no more threatening or different in the way they address liberal states than other claims for cultural diversity (2000: 188):

The political demands of Muslims . . . are not akin to conscientious objections, to principled exemptions from civic obligations, but – akin to other movements for political multiculturalism – are for some degree of Islamicization of the civic; not for getting the state out of the sphere of cultural identities, but in some small way for an inclusion of Muslims into the sphere of state-supported culture.

However, Tariq Ramadan, another arguing for the place of Islam within European states, claims that it is essential to understand the distinctiveness of Islam as a religious belief system (2002: 207–8):

The central point is that Islam is, first and foremost, a divinely revealed religion, with belief in its universal validity, a way of life, a concept of life and death, and not merely the cultural characteristic of a specific population coming from countries outside Europe. Indeed without taking into account this religious dimension, all discussions about aspects of Islam in Europe – social and political integration, economic progress, or other matters – would be, if not futile, highly inadequate.

This stance seems to consider that the religious basis of Islamic belief makes it a prior form of cultural allegiance, which if true, would go against Modood's suggestion of an easy possible cohabitation between Islam and civic culture. Indeed, opponents of multiculturalism see Islam as a threat for the same reason, thus Huntington's 'clash of civilizations' predicts European societies divided along religious lines, for which immigration and the unwillingness of Muslims to adapt is blamed. As he argues (2002: 204), 'the degree to which Muslim immigrants and their children want to be assimilated is unclear. Hence, sustained immigration is likely to produce countries divided into Christian and Muslim communities'.

Such debates demonstrate that religion is important for understanding multiculturalism and its consequences. We consider that religion matters for at least two reasons. First, although European societies see themselves as broadly secular, Christian religions often play important institutional social and political roles, regardless of how many or how few people actually believe or practice the religion. These institutional arrangements define pre-existing conditions and the political environment into which migrant religions have to find a space for their community. Second,

religious identification is a belief system that can shape people's core identity and shape their associational activity and political behaviour. This is likely to be enhanced for migrants, because they often live detached from the grasp of core public institutions promoting civic values and rely on their own religious institutions and family networks as a 'community' support system. The nature of religion, and the demands it makes on its followers' way of life, is likely to influence the extent to which migrants' beliefs and understandings adapt or resist when confronted with those of the dominant culture.

In this article, we focus on the claims-making by minorities of migrant origin for particularist group demands in Britain, the Netherlands and France. In contrast to the many normative contributions (e.g. Bauböck, 1994; Kymlicka and Norman, 2000), we address the purported challenge of claims for cultural difference empirically. Britain, the Netherlands and France are suited for comparison with roughly similar proportions – between 7.5 percent and 10 percent – of migrants and their descendants in their populations, from similar waves of migration. Although their migrant stocks come partly from similar and from different regions of origin – Britain: the Caribbean and Indian Subcontinent; Netherlands: Indonesia, the Caribbean, Morocco and Turkey; France: the Maghreb – they have significant Muslim communities, making up about 3.5–6 percent. Our original data-set on claims-making is drawn from 1992–98. This allows us to compare the impact of Dutch multiculturalism, before it became less facilitating of group demands, with Britain's 'race-centred' cultural pluralism, and French policies which strongly resist differentialism. Thus we examine the challenge of group rights in relation to the different national policies for cultural pluralism.

First, we discuss the challenge of group demands, before giving cross-national details on policy approaches. After outlining our method, we make an overview of claims-making for group demands across the countries, before undertaking a qualitative analysis of those by Muslims.

THE CHALLENGE OF GROUP DEMANDS AND ISLAM

Others use the terms 'multiculturalism' or 'differentiated citizenship' for migrants' particularist group demands. Because we use the term 'multiculturalism' for a policy approach, we refer to 'group demands'. 'Group demands' is an umbrella term for the political field of claims by migrants for group-specific rights, recognition, and exemptions from duties, with respect to the cultural requirements of citizenship in their societies of settlement. Although this is a heterogeneous category, all group demands share two features: first, they are demands that go beyond the set of common civil

and political rights of individual citizenship which are protected in all liberal democracies; second, they are demands that, if realized, constitute the recognition and accommodation by the state of the distinctive identities and needs of migrant groups.¹

Regarding the challenge of group demands, a first point is that the idea of a unitary citizenship based on equal individual rights on which liberalism rests is an ideology, and not an accurate depiction of reality for a typical liberal nation state. Most nation states attribute some group rights in the form of corporatist or federal arrangements, and most give preferential treatment to specific religions over others. Thus, in Britain, the historical accommodation of church and state has made the Monarch Head of State and Head of the Church of England. To this day in Britain, the state privileges its own religion within politics, for example, with Church of England Bishops sitting in the second chamber, the House of Lords, which is not the case for other denominations.

While some migrants' group demands are for 'parity' of treatment with other religious and ethnic groups, others go further, requesting special or 'exceptional' treatment relative to other groups in society. Some exceptional demands are easily accommodated by liberal states. Indeed, as reparation for past Nazi crimes, the German state itself promotes preferential treatment for the associational activities of Jews and Roma. Nonetheless, some migrants' exceptional demands are less easy to accommodate, because they actually challenge the very essence of liberal values. For example, Muslims practising polygamy, female circumcision, or *sharia* divorce, would be committing acts that contradict most liberal states' legal and moral understandings of equality, between individuals, and men and women. How common or representative such cases are is not clear. We suspect that many immigrants to Europe are likely to adhere to different understandings of Islamic practice, or that such practices would diminish over time, making them atypical.

Although controversies over group demands are often played out publicly through symbols, such as headscarves and minarets, they are also conflicts about the distribution of material resources. Cultural demands made by migrants in public education or welfare, where the state has responsibilities for providing and distributing services, present challenges to a pre-existing institutionalized context in which the native 'white' population has defined stakes and real interests too. This is why cultural conflicts often take place in institutional settings. The example of separate schooling for Muslim girls in Britain is a parity group demand because other faith groups have state-sponsored single-gender schools. One difference between Catholic girls' schools and Islamic ones, however, is that Islamic schools make a religious faith central to education that promotes values that are less commensurable with liberalism than modern Catholicism. Sometimes Muslim parents' arguments for faith schools make little effort to fit within

the cultural pluralism of the civic community, for example, when they express fear at the possible 'westernization' of their children. Important here is that some Muslims see Islam as being more 'true' than other faiths, and more authoritative than the state, which is problematic for liberal democracies.

It is also necessary to recognize that the global Islamic upsurge is not only a political movement, but also a revival of commitments that have explicitly religious underpinnings (Berger, 1999). It has led to a restoration of Islamic beliefs and lifestyles based on ideas about the relation of religion and the state, women, and the moral codes of everyday behaviour, which contradict the modern ideas of European liberal states. Islam is not just a 'homeland hangover' brought by new immigrants and followed by older people, but it is often a source of identification for second and third generations, attempting to find their place between the culture of their parents and the rejection by their country of birth. Many of those choosing to wear the dress and accoutrements of Islam are educated professionals, the sons and daughters of assimilated migrants. The revival of Islam in Europe is perhaps more of a reaction to attempted integration processes than a – following the clichéd stereotype – product of an alien culture imported by immigration.

A last point concerns the native publics of the host society. Native publics and their liberal intellectuals often see themselves as the defenders and upholders of the 'myth' of a unitary national citizenship. However sincere such allegiances to liberal principles may be, their proponents may be wedded to a version of those concepts that, when compared to reality, is an historical anachronism or, alternatively, is based on nostalgia for the nation's past. This can lead to public discourse dynamics taking over and the actual problems become distorted under a barrage of emotive rhetoric about national values and identity.

We now outline the policy traditions for accommodating cultural and religious difference in France, Britain and the Netherlands.

NATIONAL VARIANTS OF CULTURAL PLURALISM²

We look at integration policies and the political accommodation of religion as the two aspects of political context which define a national variant of cultural pluralism. Religion is an important aspect of a state's political accommodation of migrants' cultural difference, which is often overlooked or simply subsumed under a discussion of integration policies, though it is actually distinct as a policy field, which has significant consequences. Thus, many liberal states attempt consciously to shape the civic-cultural identification of migrants toward their society of settlement, but do not attempt to

shape migrants' religious identifications in a direct way, not least because the state upholds freedom of religious practice.

France's naturalization laws were designed to 'make Frenchmen out of foreigners' (Ireland, 1994). However, the state's strong affirmation of individual assimilation and the pursuit of a secular universalist republicanism under the principles of *liberté, égalité, fraternité*, has provided very few resources and little recognition to migrants for their associational activities. 'Ethnic' associations were permitted only in 1981. Migrants were expected to integrate themselves by joining their compatriots in political parties and trade unions, instead of mobilizing their own group interests and identities. This led to difficulties, not least because the denial of cultural differences as legitimate policy categories did not prevent cultural difference becoming a basis for discrimination and racism, a fact demonstrated by the *Front National's* polemics against 'un-assimilable immigrants'. Overall, France has produced relatively few policy instruments for combating forms of social exclusion rooted in cultural and ethnic difference. In addition, the French state is assertively secularist. The 1905 law separating church and state prevents direct public funding of religious communities. The state sees public displays of religious faith as a challenge to *laïcité*, its own secular republican ideology for a universal undifferentiated citizenship. Consequently, the visible presence of Islam with mosques, minarets and calls to prayer, has readily led to public 'clashes of civilizations' French-style. Over time, minimalist commitments to basic requirements for Muslims to practice their religion, including prayer spaces and food requirements, have been granted. However, the centralized organization of Catholic, Protestant and Jewish religions initiated by the Napoleonic state was only replicated for Islam in December 2002. Discussions started in 1990 to establish a High Authority of Islam, often foundering on the insistence by politicians that such an institution remains a strictly religious council and does not become a forum for political consultation (Laurence, 2003). The French Council for the Muslim Religion is the first formalization of relations between Muslims and the state. It is part-elected and part-appointed and arranges chaplaincies in the army and prisons, acquires burial sites, grants 'halal' certificates, organizes pilgrimages, and builds mosques and prayer halls. This development has not, however, prevented the banning of ostentatious Islamic accoutrements in public life. In 2004, the Justice Minister Perben expelled a woman from jury duty because he considered her headscarf a sign of religious commitment that would prevent her impartiality. Also the French Parliament, with the blessing of President Chirac, passed a bill by 494 to 36 votes banning the Muslim headscarf and all other overt religious symbols from schools.

In Britain, migrants' organization and political participation is facilitated by the state for ethnic or racial minorities. A state-sponsored 'race relations' industry emerged, backed by anti-discrimination legislation, the

Commission for Racial Equality (CRE) and local bodies which report on practices for ensuring equal treatment. Political elites adopted 'race' as a category to address the disadvantage of minority populations caused by discrimination. One outcome is that policies were tailored more to the integration of Afro-Caribbeans under the umbrella term 'black' than relatively later inflows of migrants from the Indian subcontinent (Hiro, 1991). Race relations politics was extended to Indians, Pakistanis and Bangladeshis under the generic term 'Asian', which means that groups with self-identifications that are non-racial, principally Muslims, were served less well by the institutional apparatus (Modood, 1988; Statham, 1999). In contrast to this 'racialized' sponsorship of minorities, religious institutions receive no direct state support. Religion is relegated to a matter of private individual conscience within public institutions, but the state does privilege its own Church of England within politics. More than 20 Anglican bishops sit in the House of Lords, and the Church of England, headed by the Queen, stands as the official religion. The limit British law sets on extending rights to minority religions was clearly demonstrated by the Rushdie ruling that blasphemy does not extend to Islam. This was not because the religious content of law was considered archaic or redundant, it had been used as recently as 1977 to prosecute a poem depicting Christ as a homosexual. A key feature of race relations legislation is that it attributes rights to secular and not religious groups. Special laws with regard to racial discrimination are not replicated with regard to religious discrimination (with the exception of Northern Ireland). Several interpretations of the Race Relations Act 1976 have not extended group rights against discrimination to Muslims, although two ethno-religious groups, Sikhs and Jews, have been legally considered 'ethnic' groups since 1983. Even when the CRE brought a case against an engineering firm refusing to employ Muslims because it saw them as 'extremists', the employer was found guilty only of 'indirect discrimination' against the racial category 'Asians', not for anti-Muslim sentiments (Lewis, 2002: 250).

The Netherlands recognized early on that many 'guestworker' migrants would remain and reacted through the inclusive *Minderhedennota* (1983) with a goal of: 'Achieving a society in which all members of minority groups in the Netherlands, individually and also as groups, are in a situation of equality and have full opportunities for their development', in short, a policy for 'integration with retention of own culture' (Entzinger, 2003: 63). Importantly, Dutch policies saw migrants according to their group membership and not primarily as individuals. Following the 'pillarization' (*verzuiling*) tradition for institutionalized pluralism, this provided a large degree of autonomy for 'ethnic minorities' in the cultural sphere, and incorporated migrant elites into politics by subsidizing representative organizations and including them in the policy process. Even civil service positions and local voting rights were opened up to foreign residents. Elites considered that

integration would be best accomplished through confident subcultures, making a preservation of minority cultures essential to their incorporation. In the 1990s, the realism that maintaining group diversity could also mean structuring the disadvantages of groups, meant that policies shifted from overt multiculturalism toward an emphasis on socioeconomic parity. Nonetheless, the Dutch approach is still distinctive and offers a wider and deeper range of cultural opportunities for minority groups. Dutch consociational politics has traditionally delegated state prerogatives to 'pillars' of religious communities. Consequently, religious group rights extend further than elsewhere, so that, for example, religious groups have a legal right to public funding for their schools. The Netherlands has gone a long way towards including religious minorities within its definition of the national political community. The opening of Parliament is officially blessed by leaders of all minority religions. There is a state-funded Islamic broadcasting network, an Islamic school board, an Islamic pedagogic centre, and more than 40 Islamic schools, all public funded with a regular Dutch curriculum. Because Christian and Protestant 'pillars' had state-sponsored semi-autonomous education, health and welfare institutions, it was difficult to deny such rights to newer cultural and religious minorities.

Among our countries, there is sufficient variation to test whether the different ways that states attribute cultural pluralism has an impact in shaping claims-making for group demands. Here the continuum runs from the Netherlands, which offers the most open version of cultural pluralism by granting group rights and exemptions to minority and religious groups, through to France, whose civic universalism embodied in the principle of *laïcité* opposes all differentialism. Britain with its peculiar race relations formula comes in between, recognizing some migrants' group rights through an ascriptive 'racial' identity, but not extending such privileges to minority religions, and especially Islam. Before examining our samples of group demands, we first comment on methods.

METHOD

To address our questions regarding group demands, we use media-based data on public claims-making. We are fully aware that newspaper coverage is not an undistorted and complete mirror of reality. From the multitude of claims made on a daily basis by a variety of groups in liberal democracies only a few are actually reported in the media. However, it is precisely this publicly visible aspect of claims-making that is our interest, because this has the potential to impact on public perceptions or policy making. Claims-making that does not mobilize any media attention may be considered to have not occurred, because its existence is known only to the would-be

claimant. Our explicit aim is to explain the pattern of those claims that are actually able to penetrate the mass media and which have the opportunity to become part of the processes of public debate and policy deliberation.

In contrast to many media content analyses, we are not primarily interested in the way that the media frame events. Our focus is on the news coverage of mobilization, public statements and other forms of claims-making by non-media actors. Taking a cue from 'protest event analysis' from social movements (Rucht et al., 1998), our units of analysis are not articles, but individual instances of political claims-making.

We define an instance of claims-making as a unit of strategic action in the public sphere that consists of *the purposive and public articulation of political demands, calls to action, proposals, criticisms, or physical attacks, which, actually or potentially, affect the interests or integrity of the claimants and/or other collective actors*. Political decisions and policy implementations are included, as is violence between contending groups, even if no explicit verbal claim is reported, e.g. attacks between extreme-right, immigrant, and antiracist groups, or between different ethnic or religious groups. This makes the focus of inquiry 'contentious politics', i.e. processes of interaction between actors, and the coalitions, alliances and networks, and conflict lines which connect and relate different types of collective actors in a multi-organizational field (McAdam et al., 2001).

Data are retrieved from one national newspaper per country: *The Guardian* for Britain; *NRC Handelsblad* for the Netherlands; and *Le Monde* for France. These are independent newspapers of public record with a nationwide scope of coverage and readership. All are broadsheets with a reputation for consistent and detailed coverage of migration and ethnic relations. The main news sections of every Monday, Wednesday, and Friday issue were coded for all political claims-making relating to immigration, migrant integration, and racism and xenophobia.

Another common objection to our data is that some forms of claims-making are successful because they are not reported in the media. Some collective actors, especially more powerful ones, do not need the mass media or may prefer to operate away from the public eye because they can exert pressure by direct access to, and influence on, decision makers. Some groups may be successful in the lobbying circuit without having to demonstrate broad public resonance and support; e.g. a multinational corporation may be effective simply by threatening decision makers with disinvestments or capital flight. However, for most groups, and particularly those in immigration, successful lobbying must be backed by public visibility, resonance, and legitimacy. Therefore, we are confident that a survey of the non-public claims-making of lobby groups would not show very different patterns from the ones we present, apart from the fact that the distribution of actors in such lobbying data would be skewed towards the more institutionalized and resourceful ones. It should be made clear,

however, that with our data, we cannot in a strict sense generalize beyond public forms of claims-making.

An important question remains regarding whether our primary sources are representative of the wider media landscape. We have tried to minimize the problem of description bias (McCarthy et al., 1996) by coding only the factual coverage of statements and events that appear in the newspapers, and excluding comments and evaluations by editors or reporters. Even when disregarding the explicit opinions of journalists, it could be that the picture obtained in a particular country depends strongly on the newspaper chosen. To check for such biases, we have drawn additional samples from other newspaper sources. The comparisons of these alternative sources reveal important differences in the *rate* of coverage of relevant claims, especially between national quality papers and the more limited coverage in tabloid and regional papers. However, such differences in coverage *rates* coincide with strikingly similar *distributions* of acts on important variables. Such inter-newspaper comparisons suggest that by using quality national newspapers we obtain a valid picture of claims-making patterns.

Important variables coded refer to the identity of the actors making the claim, including full organizational names, action forms, and (where present) the size, target, and intensity of protest. Regarding the content of the claims, we coded for each act up to three aims or demands, up to two frames, and the actors on whom demands are made (addressee) or who are objects of criticism. Further methodological details can be found elsewhere (Koopmans and Statham, 1999a; Koopmans et al., 2005). The resulting dataset is suitable for macro-level comparative analyses of broad issue-fields, but at the same time can zoom in on qualitative aspects of particular actors and claims, as we now hope to demonstrate.

THE OVERALL PICTURE OF MIGRANTS' GROUP DEMANDS

From our coding definition, claims become categorized as group demands, only when migrants request group-specific provisions or exemptions relating to their cultural or religious differences. Thus, not all demands by Muslims are coded as group demands. It is the content of the claim not the claimant's identity which determines whether it is a group demand. For example, within schooling, a Muslim demand 'for Islamic faith religious lessons' is clearly for particular cultural provision and coded as a group demand, whereas one for 'better schooling provision' demands only greater participation rights within education, and is coded among the social equality claims.

A first empirical question is the size of the challenge of migrants' claim-making for group demands to liberal nation states. Table 1 shows cases

Table 1 Claims-making for group demands: The Netherlands, Britain and France, 1992–98

	<i>Netherlands (%)</i>	<i>Britain (%)</i>	<i>France (%)</i>
All claims-making over group demands/ All claims-making	5.5	7.7	6.6
Migrants' claims-making for group demands/All claims-making	2.0	3.4	2.1
<i>N</i>	2,286	1,313	2,388
Migrants' claims for group demands/All migrants claims-making	20.8	17.1	18.4
<i>N</i>	216	258	267

where the substantive focus of migrant claims-making is for group demands relating to cultural or religious difference. It gives figures, first, for all collective actors (first row), and then for migrants (second row), as a proportion of all claims-making on immigration and ethnic relations. The third row shows migrants' claims for group specific demands as a proportion of migrants' claims-making.

First we see that, even when we include the claims by non-migrant collective actors, quantitatively, the proportion of claims-making about group specific demands remains very modest: Netherlands 5.5 percent, Britain 7.7 percent, and France 6.6 percent. Second, migrants' group demands constitute a very small proportion of all claims, accounting for 2.0 percent in the Netherlands, 3.4 percent in Britain, and 2.1 percent in France. According to such figures, the doomsday scenario of 'tribal antagonisms' (Schlesinger, 1998: 13) pulling societies apart at the cultural seams, or Huntington's (2002) 'clash of civilizations', appear to be strongly overstated, at least for Europe, as does Kymlicka's (1995: 1) vision of multicultural demands being the 'greatest challenge' to the liberal state.

Another finding goes against the expectations of scholars who have conceptualized the citizenship configurations of nation states as policy approaches that are the explanatory variable for the different trajectories of migrant incorporation experienced across different countries (e.g. Favell, 1998; Joppke, 1996; Ireland, 1994; Koopmans and Statham, 2000; Safran, 1997). Our own research speculated that: 'Since France invites migrants into

the political community on the basis of equality, but to the exclusion of cultural difference, it could follow that migrant claims for multicultural rights are not nearly as important in this country as in Britain' (Koopmans and Statham, 1999b: 692). Accordingly, we would expect to find much lower levels of migrants' group demands in France, than in the Netherlands and Britain, which officially see themselves as 'multicultural' and 'multiracial'. Against this, our data show similar levels of group demands in France, Britain, and the Netherlands, which points to a limitation of national institutionalist approaches in shaping migrant behaviour in their own images.

Turning to the identities used to make group demands, there are at least four types of collective identities for migrants: (1) generic status categories of integration policies, e.g. as 'ethnic minorities' in the Netherlands, or as immigrants (*immigrés*) in France; (2) 'racial', e.g. as 'black'; (3) religious, e.g. as Hindu; or (4) ethnic, or of the nationality of their country of origin, e.g. as Roma or Turks. A fifth identity is the hybrid of ethno-religious for groups for whom religion and ethnicity are indistinguishable. In addition, each identity may refer to the country of residence, e.g. *British Muslim Action Front*, or be composite, referring to multiple identities, e.g. the *Turks-Islamitische Culturele Federatie* is 'Turkish' and 'Islamic'.³ Such identifications overlap and are to an important degree in competition with each other. The same migrant group may mobilize as 'Pakistanis', 'Asians' (race relations' category for Indian Subcontinent migrants), 'Muslims', 'British Muslims' or as 'ethnic minorities'. The self-identification used for entering the public domain is strategic.

Table 2 shows the collective identities of migrants making group demands. These were coded from the ways in which migrant collective actors appeared in our newspaper sources, in particular from the names of organizations and groups. Names of organizations are important vehicles for the self-presentation of groups toward their constituency and wider society, and are good indicators for a group's self-identification.

The most striking feature is that more than half of these migrant group demands were made using religious forms of identification in France (53.1%), six-tenths in the Netherlands (60.0%), and two thirds in Britain (65.9%). In addition, we see that the vast majority of these group demands were made by migrants identifying themselves as 'Muslim' or 'Islamic' (France 51.0%, Netherlands 46.7%, Britain 61.4%). This is surprisingly high for Britain, which sponsors the 'Asian' identity for Indian Subcontinent minorities, and France whose policies do not recognize specific groups. Again the impact of national context appears limited.⁴

A comparison of Islam with other migrant religions is further revealing. Although Britain and the Netherlands have significant migrant populations of Hindu faith, facing exactly the same integration and church/state policies as Muslims, there is little evidence for group demands by Hindus (Netherlands 6.7%; Britain 2.3%). Likewise, the ethno-religious group, Jews, focus

Table 2 Collective identities used by migrants in claims-making for group demands: The Netherlands, Britain and France, 1992-98

	<i>Netherlands</i>	<i>Britain</i>	<i>France</i>
Policy-status identities	15.6	4.6	32.7
Foreigners	8.9	–	–
Minorities/allochthonen	4.4	4.6	–
Immigrants	2.2	–	10.2
Illegal immigrants/sans papiers	–	–	2.0
Harki	–	–	20.4
Racial identities	2.2	22.7	0.0
Black	–	18.2	–
Asian	–	2.3	–
Other	2.2	2.3	–
Religious identities	60.0	65.9	53.1
Muslim	46.7	61.4	51.0
Hindu	6.7	2.3	–
Rastafarian	2.2	2.3	–
Other	4.4	–	2.0
Ethno-religious identities	2.2	6.8	8.2
Jewish	2.2	6.8	8.2
Ethnic and national identities	31.1	0.0	6.1
Sinti and Roma	2.2	–	–
Turkish	15.6	–	–
Chinese	2.2	–	–
Mollucan	2.2	–	–
Morocco	6.7	–	2.0
Other African	2.2	–	4.1
Surinamese	2.2	–	–
Hyphenated identification with country of residence	2.2	9.1	14.3
Sum total	111.1	109.1	114.3
<i>N</i> =	45	44	49

*Note that subcategories do not add up to total of categories due to rounding errors.

their attention much less on the group demands field than Muslims. Jews make 2.2 percent group demands in the Netherlands, 6.8 percent in Britain, and 8.2 percent in France, while they accounted for 8.1 percent of claims-making by Dutch migrants, 5.5 percent by British, and 19.6 percent by

French migrants respectively. This stands in sharp contrast to Muslims, for whom between four-tenths and two-thirds of all claims-making was for group demands (Netherlands 50.0%, Britain 67.5%, and France 41.7%). Claims-making for group demands thus appears largely to be a group specific phenomenon of Muslims.

With respect to the differences between Jews and Muslims, one can point to the much longer history of political accommodation of Jews within European societies. In addition, the vast majority of Jews practise their faith, if at all, to the same limited extent as the vast majority of nominal Christians. Such factors may explain why Jews make few group demands relative to Muslims. However, such differences do not hold for Hindus, who came in the same waves of migration, from the same regions, and who have received similar levels of political and religious accommodation as Muslims. Although Hinduism in some of its manifestations can promote values that are equally as incommensurable to liberal democratic values as Islam, Hindu group demands are largely invisible in the public domain.

We consider that this relatively low level of Hindu group demands compared to Muslims is a result of the different infrastructures of the two religions in their societies of settlement. Islam is a more collective and public religion centred on the mosque, whereas there are many different types of Hinduism, traceable in part to regional or caste differences, and the home is often the principal location for worship in a religion which demands few public celebrations (Hiro, 1991; Poulter, 1998). As a non-proselytizing decentralized religion that is practised privately, Hinduism has fitted more easily as a minority religion into the political space granted to it. Also Hindu temples have not taken on the same functions for the migrant community, providing services and negotiating at the interface with political authorities, compared to mosques for Muslims. As a consequence, Muslim self-identification appears to be particularly resilient, even leading to demands for group rights and recognition in its own name.

Regardless of the differences in national contexts for attributing group rights, principally only Muslims make group demands. This finding provides strong suggestive evidence that the relationship between liberal states and their Muslim migrants leads specifically to claims-making for group demands. On the one hand, it could be something specific to the political position of Muslims in their societies of settlement, which produces claims-making for group demands independently of national context. Here, we hypothesize that *it is the public nature of the Islamic religion, and the demands that it makes on the way that followers conduct their public lives, which makes Islam an especially resilient type of identity, and which results in claims-making for group demands.* On the other hand, it could be something specific to the way that liberal democratic states attempt to accommodate their Muslims. Here, we hypothesize that *there are specific deficits*

in liberal states’ cultural provision for migrant and religious group needs which impact disproportionately on groups who are practising Muslims. In order to investigate this, empirically and cross-nationally, we undertake a detailed qualitative analysis of Muslims’ group demands.

THE CHALLENGE OF ISLAM: MUSLIMS’ GROUP DEMANDS

Figure 1 shows the analytic dimensions of group demands for our qualitative comparison.

First, we distinguish between two types of group demands for rights: ‘exceptional’ and ‘parity’. By ‘exceptional’, we refer to those group demands for rights that are not already granted to other native cultural, minority or religious groups. Claims for exceptional group rights demand something substantively ‘new’, or a special exemption, which, if realized, sets the specific group apart from all other groups. It is particularly challenging because it demands rights and exemptions that go beyond those granted to other migrant or religious minorities. A demand to wear the headscarf in a French state institution where exhibiting ostentatious religious symbols is prohibited is an example of an exceptional group demand. By contrast, ‘parity’ demands for group rights request the same privileges and exemptions from duties already extended to other religions and migrants. Here the group demand is for equality with other groups, often those already granted special treatment.

Generally, parity demands are less challenging and easier to accommodate than exceptional ones, because they do not directly confront the logic of the category system used by a country’s policies for cultural pluralism.

Type of group demand	Exceptional Parity Collective identity
Motivational Impetus for group demand	Proactive Reactive
Level and Form of Protest Action for group demand	Level: Low; Medium; High Form: Demonstrative; Confrontational; Violent
Overall Orientation	Acculturative Dissociative

Figure 1 Analytic dimensions of claims-making for group demands

Thus British Muslims demanding recognition as a discriminated group within race relations, on the same basis as Jews, Sikhs, and racially defined groups, is an example of a parity demand. Not all group demands are for rights, some are weaker and simply mobilize a group's 'collective identity' as a visible presence in the public domain. An example of this would be a Muslim federation stating 'we want to transmit the Islamic religion, not politics'. This is not a demand for group rights made on the host state and society, but asserts a specific group identity relating to religion or culture within it. Our analysis focuses primarily on exceptional and parity group rights demands, because these are more explicitly formulated, and engage more clearly with a state's policies.

Second, we consider the nature of the relationship between the state and native public versus the Muslim group, which produces a group demand. We refer to this as the *motivational impetus* of a group demand. A 'pro-active' group demand is mobilized autonomously by the Muslim group, independently from actions by the state and host society actors, and is a more assertive type of claims-making. Conversely, a 'reactive' group demand is mobilized in response to an intervention by state or native public actors, for example, when the state officially bans or refuses to recognize a form of religious or cultural expression.

Third, we look at the action forms used to mobilize a group demand. Here we use the standard social movements' categorizations for action repertoires, which range from conventional and demonstrative to confrontational and violent protest.

Overall, the strategic orientation of a group demand may be considered either *acculturative* or *dissociative* in its relationship to a state's cultural pluralism. *Acculturative* claims-making fits within a state's policies for categorizing minority or religious groups, whereas *dissociative* claims-making challenges a state's approach to minority and religious difference, by making a demand which goes further than, or ignores, current formulations. Generally, one would expect exceptional rights demands to be *dissociative* because they are the most demanding on the dominant host culture, and are more likely to lead to reactions by state institutions and native public discourses. Parity rights demands may also become highly controversial, and provoke strong native reactions, though they are more likely to be *acculturative* because they try to fit into an existing framework of political accommodation.

The Netherlands: Islam pushing for a new 'pillar'

The Muslim group demands in our Dutch sample cover issues common to discussions of multiculturalism. Six refer to issues about Islamic schools, six are about attempts to set up a Dutch Imam school, and the remainder cover requirements and exemptions for halal meat, provision of religious and

cultural centres, Imams for Muslim prisoners, broadcasting rights for Muslims, and divorce by *sharia* law.

Sixteen of the 21 cases in our sample are demands for 'parity' group rights with other groups, four are claims for 'exceptional' group rights, and only one stands outside the context of rights demands and mobilizes a 'collective identity'.

Concerning the action forms used to mobilize demands, there is only a single case of protest. Here the Aya Sofia Association and the Mosque Neighbourhood Association Milli Görüs in Amsterdam organize a 6000 strong demonstration against the refusal of the borough to permit a large cultural centre. Muslims use conventional action forms such as public speeches in all other cases, which gives a first indication of the impact of the receptiveness of Dutch multicultural politics.

At first glance, our findings fit the cosy image that Dutch group-based multicultural policies produce a pacified and acculturative form of group demands. The state grants minority group rights openly in a way that encourages migrants to see themselves as new groups with new group demands. Indeed, the Dutch political space is so receptive to group claims, that even for Muslims, a group which other countries find difficult to accommodate, it is hard to make exceptional group demands. This is because the state appears ever willing to acknowledge another cultural religious 'pillar' within its national political community, using the principle that what is already granted to some groups must therefore be extended to all groups.

Another finding pointing to the confidence of Muslims in the Netherlands, is that 17 of the 21 cases of Muslim group demands were proactive, compared to only three that were reactive, and one that was unclassifiable. Again this seems to point to the beneficial outcomes of Dutch multiculturalism, which creates incentives for Muslims to make group demands. Before getting too carried away with the benefits of Dutch multiculturalism, however, it is worth looking more closely at specific examples.

Turning to the exceptional group demands, a first example is where a separate Islamic Butchers' Association is set up with the claim that Muslims are unable to follow the regular training and education of butchers because their faith prohibits them dealing with pork. Another exceptional group demand occurs when the Union of Moroccan Muslim Organizations (*Ummon*) advocates educating Imams in the Netherlands, and providing education in the language and knowledge of Dutch society for foreign Imams. These are good examples of Muslims having the confidence to proactively demand new exceptions as a group in the belief that this will be straightforwardly accommodated by the state. Although they are exceptional group demands, the strong group-based enforcement within Dutch multicultural policies means that, overall, these claims are acculturative rather than dissociative, and unlikely to provoke reactions from the host society.

In contrast, it is the strength of the group rights tradition in Dutch politics that causes another of our examples of exceptional group rights demands. In this case, Muslims actually challenge the consequences for them of the over-liberal tendencies within Dutch multiculturalism. The Dutch Muslim Council and the Moroccan Women's Society come out publicly against the bill proposed by the Secretary of Justice to recognize and accommodate one-sided marriage dissolution according to the laws of immigrants' countries of residence. Here the dissociative basis of the Muslim demand is against the proposed policies of the state, which appears willing to grant cultural group rights to Muslims that at least some important groups do not even want. In this example, the rosy image of the consequences of cultural pluralism Dutch-style begins to slip. Indeed, the biggest threat or challenge to the integrative capacity of the nation state in this instance is from the over-willingness of Dutch policy makers to grant exceptional rights rather than from the Muslims' group demands themselves.

Looking now at examples of Muslim demands for parity rights, it is clear that many would constitute demands for exceptional group rights in Britain and France. Thus the Islamic Broadcasting Foundation claims that its right to broadcast on the public channel is a good way of advancing the integration of Muslims into society. The Halal Food Foundation announces that it hopes to end the 'unreliable' supply of ritually slaughtered meat for the Islamic consumer after being granted the right to introduce their own hallmark, a concession giving parity with Jews. The Islamic Council of the Netherlands and researchers for the Islamic Chair of the University of Amsterdam, make a demand that there should be between 25 and 30 Imams employed in prisons. According to their research, this would bring Islam proportionally in line with other faith denominations. These examples demonstrate, first, the far-reaching sponsorship of group rights by the authorities, and second, that this creates a political space and set of incentives for group demands by Muslims. This legitimation of group demands has the effect of making those Muslim group demands seem officially easy to accommodate, which in Britain and France would most likely provoke reactions from states and native publics.

Relating to the training of Imams, we find the following group demands: The Centre for Islamic Studies advocates state sponsorship for the education of Imams, on a par with that provided for Christian vicars and priests, on the condition that the government does not interfere in the substance of the education. In another, *Ummoon* requests additional Dutch language training and knowledge of society as part of the education for Imams. The holder of an Islamic professorial chair at a university comes out in favour of a Dutch Imam education, as does a resident Imam. Against this, the President of the Turkish-Islamic Cultural Federation strongly criticizes the proposals of Member of Parliament Dijkstal to found a Dutch Imam school. Here we find a range of different positions being expressed by

leading organizations from different factions within the Muslim community, all in response to an agenda of group rights set by the state. These examples are illustrative of another feature of the controversies about Islam in Dutch society. Instead of controversies occurring between the native population and Muslims, Dutch state policies tend to promote controversies and competition over resources within different sections of the Muslim communities.

Such factionalism and competition within Muslim communities may lead to the proliferation of ever-smaller denominations of groups, who demand their own group rights from the state. Further evidence comes from our claims on Islamic schools. In one, the Foundation of Islamic Primary Education (IQRA) demands that different denominations from within Islam have the right to separate schools.⁵ In another, the Headmaster of the Yunus Emre Islamic primary school in The Hague advocates that a new school should be founded for a more orthodox Islamic education. On the same matter, the Islamic School Board Association (ISBO), an umbrella organization for 29 Islamic schools in the Netherlands, publicly rules that the distinction between whether a school follows liberal or orthodox Islamic teaching is unimportant. Once more, this issue demonstrates that Dutch multiculturalism encourages Muslims to set up ever smaller denominational groups, through establishing new organizations which they expect will receive state recognition and subsidies. Also, the orthodox Islam that these smaller factions will teach is likely to reproduce the separatist tendencies that will lead to internally cohesive Muslim communities, but ones which are inward-looking, and which hardly fit into Dutch society. Here we witness once more that Dutch liberal multiculturalism risks letting community group rights take precedence over the national community. Such an approach may take Dutch society in a direction that may reproduce parallel and divided rather than cohesive societies.

BRITAIN: ISLAM AS A CHALLENGE TO RACE RELATIONS

In our group claims by Muslims in Britain, five relate to the issuing of a fatwa against Salman Rushdie for his novel, *Satanic Verses*. Another five relate to the perceived stigmatization and lack of public respect by the native population for Islam. Of the remainder, a significant proportion are about the relationship between the state and the Muslim community, including claims about subsidies and recognition for Islamic schools, religious education in state schools, and anti-discrimination measures, prison treatment, the suitability of social amenities provision and political representation with respect to Muslims.

Of the 27 group demands, nine are for exceptional rights, nine for parity

rights, and nine do not make rights demands but mobilize a collective identity. This differs from the Netherlands where most demands are for parity, not exceptional rights. Generally, this indicates that British Muslims have more difficulty fitting their demands within the framework for multiculturalism than their Dutch counterparts.

Regarding their motivational impetus, we find a strong tendency for proactive group demands, with 20 proactive cases, five reactive, and two unclassifiable, which is similar to the Netherlands. This shows that British Muslims have sufficient incentives from their country's policies to assert themselves autonomously about issues relating to their cultural and religious identification. Whereas Dutch Muslims' assertiveness was almost entirely acculturative (and for parity demands), a significant proportion of British Muslims' proactive demands are dissociative (and for exceptional demands). Thus British Muslims' claims-making for group demands is more confrontational.

This confrontational nature of Muslim group demands is underlined by their action repertoire. In seven of the 27 cases, Muslims use protest to mobilize their group demands, and five of these are confrontational or violent events. Thus Muslim youths petrol bomb a Bingo hall in protest against a company called 'Mecca' using its brand name publicly to promote gambling. In another, Muslim tenants launch a petition against Blackburn Council requesting that their toilets be repositioned so that they no longer face Mecca. In further cases, Muslim parents organize boycotts by their children of state schools, against what they see as the harmful effects of comparative religion lessons in the national curriculum.

Turning to the nine exceptional group demands, which are all proactive, three refer to the Rushdie affair and challenge the authority of the state. Thus the Muslim Parliament appeals to the authority of Islam above British law: 'He (Rushdie) has committed a capital offence. An Islamic legal authority has passed a judgement. It's just like a court passing a judgement in this country. The Muslim community feels that this judgement is right and legal.' In others, by the Muslim Parliament and the Bradford Council of Mosques, anti-Rushdie sentiments are tempered by emphasizing that anti-Rushdie campaigns should remain lawful. Another exceptional demand is where a Muslim prisoner challenges the prison's 'strip search' method. He claims an entitlement to maintain his religious beliefs and that a decision not to provide him with modest clothing was 'unlawful and unreasonable'. A boycott against comparative religion classes, is supported by the Association of Muslim Schools, who argue: 'If they get bombarded with different ideologies and different thinking, the Muslim child gets so clicked on to what the teacher is saying, that he or she thinks whatever the teacher is saying is the truth.' Welfare provision by state authorities is a further target of exceptional demands. For example, the Muslim Parliament argues that the CRE is inadequate for addressing discrimination against Muslims

and advocates setting up a 'Muslim welfare state'. Another exceptional demand addresses a non-state actor. Muslims in Nottingham criticize a shop-owner for displaying shoes that have verses from the Koran printed on them: 'It is more serious than Salman Rushdie. Rushdie wrote a book which you carry in your hand. Here the holy name goes on the feet!'

These examples show that Muslims' exceptional group demands do not fit easily in race relations politics in Britain, and are not easily accommodated. Many demands that we cite are highly incommensurable with the values of the state's minority politics. According to our interpretation, British Muslim assertiveness is not simply an inherent characteristic of Islam as a belief system, but an outcome that is importantly shaped by the political accommodation with which minorities are confronted. British Muslims achieve group rights as racial, ethnic or national minorities, but not as religious minority groups. Hence Muslims are included as a special group in the political community only indirectly, as ethnic or racial minority groups, and not directly as Muslims, which is how they see themselves. Living in a country with which they identify as much as other ethnic minorities,⁶ Pakistani and Bangladeshi Muslims feel aggrieved that their preferred form of self-identification is not legally sanctioned. Muslims perceive that this leaves them as 'second class' minorities. They see themselves as less protected from discrimination than other minority groups, and as believers of a faith that the state has been unwilling to uphold on a par with other minority religions, such as Judaism and Sikhism. British Muslims respond assertively by making demands on a state which they perceive relegates them to a 'second class' status in the national community.

This interpretation receives further support from the parity group demands, which are more acculturative, and construct a vision of how Muslims would like to position themselves within British race relations. One example occurs within the Runnymede Trust's consultations on 'Islamophobia' and calls for radical changes in the attitudes of politicians, media and community leaders to fight discrimination against 'British Muslims'. Thus the Muslim College criticizes the state for not granting anti-discrimination measures to Muslims to the extent it does for others, arguing that, 'the vast majority of our community want to live in this country and want to be citizens of this country. It is our right as citizens to be able to say to the country, "Here, we think your policies are wrong."' In another, after the 1995 Bradford riots, Muslim community leaders and the Muslim Parliament claim that 'Pakistanis are twice as likely to be unemployed than Afro-Caribbean or Indian people, there is no other reason for this than discrimination or demonization of Muslims'. In similar vein, two editors of Muslim newspapers question the suitability of the CRE for 'Muslim racial problems', with the claim that 'the Muslim population is doubly discriminated against, first because of their skin colour, and second because of their

religion'. Such claims are not confrontational expressions of cultural difference per se, but constitute reasoned arguments for more space to be granted so that Muslims can participate fully and equally as citizens in the national community. Such examples are not atypical.

Muslims' perceived grievances are not just about higher levels of discrimination than other minority groups, but about how to fit their religious faith community into the landscape of British civic values. This defines the cleavage between race relations and Muslims. On one side, Muslims assert their civic credentials as 'British Muslims', aggrieved at what they perceive as the discrimination against them by the state and native society. And on the other, the state pretends that Muslims are part of the British community, but steadfastly refuses to grant them the group rights that they fear would foster a segregated community of religious zealots living outside of British law.

FRANCE: ISLAM IN RESPONSE TO *LAÏCITÉ*

This sample of Muslim group claims is strongly shaped by a defining moment in the relationship between the French state and Islam, the 'headscarf' controversy (*affaire du foulard*). Fourteen of 25 demands directly refer to wearing headscarves in public institutions, and four-fifths are in 1993 or 1994. Issues include calls for dialogue and respect for all faiths and traditions, criticisms of the *circulaire Bayrou*, when the Minister ruled that headmasters could exclude pupils wearing headscarves as ostentatious religious symbols from state schools, protests against the exclusion of pupils, and calls for private Islamic schools following such expulsions. Regarding other issues, five refer to Islam compared to other religions in political life, a few concern Islamic universities for training Imams, religious education in schools and mosque building.

Most French Muslims' group demands are for exceptional rights (16 of 25), five are for parity rights, and in four the group simply express their collective identity. Compared to the Netherlands (less than one-fifth) and Britain (one-third), this is a higher proportion of exceptional rights demands. French republican secularism *laïcité* strongly resists all group demands, and especially those which are religious, with the outcome that Muslims' group demands are predominantly dissociative. Like the British, French Muslims tend to make group demands that confront the state authorities' policies for cultural pluralism, but unlike the British, a significant proportion of French Muslims' group demands are made in response to direct interventions by the state, producing equivalent numbers of reactive and proactive demands (13 reactive, 12 proactive). This indicates a more defensive stance by French Muslims and gives a first indication that

it is the French state's assertiveness in applying universalist principles which is important in shaping claims-making for group demands.

Given this apparently hostile institutional setting, we find surprisingly few protests in France, and the three protests have demonstrative not violent forms. Each protest occurs in response to an expulsion from a state school. In Grenoble, 1000 Muslims demonstrate outside an appeal committee for a student excluded from gym. A placard makes clear the protest is against 'an anti-religious *laïcism* that is a threat to social peace', whereas others assert the importance of the headscarf as a French identity for Muslims, 'France is my freedom, my foulard too' and 'Muslim yes, French too'. The other cases are by 100 people in Goissainville and 300 at Garges-lès-Gonesse.

Looking at the exceptional cases, we see more evidence for the defensive nature of group demands in response to an assertive state. Twelve of 16 are reactive, and 14 of these refer to headscarves. Our headscarf cases provide important insights on the nature of the conflicts between Muslims' group demands for the public expression of Islamic identity and French institutionalized *laïcité*.

Thus the General Secretary of the *Union des organisations islamiques de France* (UOIF) declares at a 3000–8000 strong gathering, that '*laïcité* must not be allowed to become a new religion, but a neutral space where liberty is given to everyone. A 12-year-old child is presented by the media like an enemy of *laïcité* just because she wants to do her thing.' In another, the UOIF affirms its support for the principles of *laïcité* but adds that this includes a respect for the right to difference (*droit à la différence*) when it responds to Minister Bayrou's declaration that wearing a headscarf is not to be permitted at state schools if it is used as an ostentatious religious symbol. When the Conseil d'Etat annuls the exclusion of three girls in Seine-Saint-Denis, the Rector of the Muslim Institute and the Grande Mosquée de Paris calls on Muslims to live in peace and mutual respect, and in dialogue with their neighbours, but also expresses satisfaction with what he interprets as this recognition by the state of Muslim specificity and respect for some of its traditions in the law. There are several examples like this, where the claim reaffirms *laïcité*, but in doing so requests more space for the expression of cultural difference, often making clear, however, that this would be an expression of 'culture' not 'politics'. A minority are more separatist in orientation. Another response to Bayrou and exclusions is by the President of the regional Islamic council and Lille-Sud Mosque, who declares himself scandalized by the level of rejection that appears on the back of *laïcité*, continuing that the state has left Muslims no alternative other than to turn to private schools.

One would expect it to be a contradiction in terms to find an exceptional demand that is acculturative towards *laïcité*, but there is an example, which is unusual and revealing about conflicts over Islam. The *Union des jeunes*

musulmans (UJM) from Lyon criticizes the public authorities who stamped the identity card of a woman, bearing a photo of her wearing a headscarf, with the words 'practising Muslim' (*musulman très pratiquant*) in the 'distinguishing marks' category. The UJM expresses concern about the segregationist attitude of the authorities with respect to the French Muslim community (*la communauté musulmane française*), demanding equal treatment for all citizens, and stating that the principle of freedom of cultural expression ought to be enforced within a framework for well-founded *laïcité*. Here the UJM uses the republican principle of *laïcité* to denounce what it sees as the stigmatization of Muslims, who are officially singled out as a group, by other sections of French society. The fear is that by being given the dubious exceptional right of public demarcation on their identity cards, this may be used discriminatively against them. Interestingly, the authorities dismiss this event as a clerk's one-off error and reassert the indivisibility of French citizenship.

To explain why Islam faces such strong cultural opposition, it is important to see that the French state views Muslim associational activity as a double challenge to its authority. First, Islam is a group identity that allows the largest set of migrants to organize collectively, thus promoting the type of sectional cultural interests that is anathema to self-understandings of French citizenship. Second, Islam is the faith of a sizeable population who actually practise their religion, and whose religious belief places restrictions on an individual citizen's duties in public life. Thus Islam allows the collective organization and promotion of religious-based values that challenge the politicized secularism of the state.

In many cases, French Muslims make group demands that try to negotiate a degree of recognition for Islamic symbols and values within a belonging to the nation. This is also evident in their parity demands, which deny religion, either by advocating secular-civic forms of Muslim associational activity, or alternatively, by claiming that religious practice is outside the political realm. Thus, the President of *l'Union des familles musulmanes-Islam de France* (UFM) argues that family ways oppose Islamic extremism, and the aim of his *laïque* association is to reconcile the rights and duties of Muslims resident in France, the Arab culture (*la culture arabe*), and the French civil code. He distinguishes between a political Islam of extremism, which is rejected, and the potential contribution of civic associations of recognized secular Muslim minorities to French political life. Expressing similar sentiments, the UOIF's general secretary calls for an 'islam de France', arguing that it is a non-negotiable prerequisite for engaging in political life, that all allegiance to a foreign country must be renounced, and the democracy, laws and values of the Republic respected. In another, the Paris Mosque's Rector expresses disappointment at not being invited by the President of the Republic to his ceremony of good wishes (*voeux*) for the heads of religions, alongside the Archbishop of Paris, the Head Rabbi of France, and the President of the

Protestant Federation. Nonetheless, he also points out that the Paris Mosque was founded by state decree, thereby advocating that the state ought to establish a centralized Islamic religion, and the same relationship that it has with the other faiths. The remaining Muslim parity demands also request the same place for Islam as the restricted role already granted to other faiths, namely to concentrate on worship not politics. Thus the aptly named *Association pour le dialogue islamo-chrétien et les rencontres interreligieuses* (ADIC – association for an Islamo-Christian dialogue and inter-religious meeting) calls for ‘fraternité’ (brotherhood – echoing the state’s motto *liberté, égalité, fraternité*) between the three monotheistic religions in France.

The strict separation between religion and politics in France makes any publicly visible associational activity by Muslims appear problematic and a challenge to the *laïcité* principle. Like Britain, France is unwilling to accommodate political space for Muslims, but is more forthright and explicit in enforcing this stance. French Muslims are under no illusions that religious faith has no part in civic public life. Conflicts arise in Muslim interactions with state authorities. Mostly Muslims are defending their group against a state enforcement of *laïcité*, but at the same time they make efforts to define Islam within national belonging. This is especially evident when group demands are for an ‘Islam de France’, or a secular-associational Islam, or an apolitical religious Islam. We find very little evidence for separatist demands, or, in contrast to Britain, expressions proclaiming the political-legal authority of Islam above the state. Nonetheless, the French state’s entrenched opposition to all religion in public life, and its suspicion that Islam entails political aspirations, leads to an ongoing problematic relationship between France and her Muslims.

CONCLUSION

This article has addressed the leading question of the challenge of group demands to liberal democratic states. To our knowledge, we are the first to test assumptions underpinning the multiculturalism debates with evidence drawn from a systematic representative sample of this scale and type. This allowed us to conduct a qualitative analysis of group demands located within an overall cross-national comparative picture.

First, we found relatively few group demands in all countries. This suggests the strong emphasis on group demands in the literature is not matched by migrants’ own perceptions of their political realities and aspirations in their societies of settlement. Overall, we suspect many scholars have mistakenly raised the high prominence of a few cases, such as Rushdie, to general theories about the integrative capacity of the liberal nation state, leading to exaggeration.

Second, we found the same levels of group demands in countries regardless of national differences in their approaches to cultural pluralism. Contrary to previous suppositions (Ireland, 1994; Koopmans and Statham, 1999b), this shows that, at least for group demands, there are limitations in the degree to which nation states are able to shape migrants' political identifications in their own image. However, closer inspection revealed this to be a group-specific deviation from the norm that held for migrants using Muslim or Islamic identities. Our qualitative analysis sought to shed further light on the relationship between Muslims' group demands and national forms of political accommodation (see Figure 2 for an overview).

Closer investigation of the Netherlands made us sceptical that granting multicultural rights strengthens political integration in multiethnic societies. For a start, we found the state sometimes promoting group rights for Muslims, which more liberal Muslim groups did not want. The Secretary of Justice's Bill to allow one-sided marriage dissolution put group law above

State and Native Society: Rights Granted			
	Netherlands	Britain	France
Minority group rights	Yes	Only racial and ethnic groups	No
Religious group rights	Yes	No	No
Muslim Claims-making for Group Demands			
	Netherlands	Britain	France
Type of group demands	Parity	Exceptional Parity Collective Identity	Exceptional
Motivational Impetus of group demands	Proactive	Proactive	Reactive/Proactive
Relative Level and Form of Protest for group demands	Low Protest Demonstrative	High Protest Confrontational/ Violent	Medium Protest Demonstrative
Overall Orientation of group demands	Acculturative	Dissociative	Dissociative

Figure 2 Summary of findings on Muslims' claims-making for group demands: The Netherlands, Britain, France, 1992–98

national civic law by denying the individual equality of women. Here the famous Dutch tolerance seemed prepared to sanction similar attitudes – i.e. inequality of women – to the illiberal ones that it has long tolerated for decades from Protestant fundamentalists. This is only one case, but is instructive about the impact of policies on associational activity by Muslims. The state grants so many group rights that being acculturative in the Dutch political context does not substantively mean being integrated into the national community, but in some cases being separated from it. Dutch multiculturalism may lead to less public conflicts, but this can also be read as a lack of care for ensuring community cohesion. If the native Dutch communities are self-organized in their own ‘pillars’ and their lives do not come into any institutional contact with Muslims, then why should they be bothered by Muslims’ strange demands and odd-sounding customs?

Such a reading is supported by other more recent examples of controversial issues about group rights arising from initiatives taken by mainstream institutions and authorities, which were not in response to any correspondent demands from the Muslim community. These include the aborted attempt to introduce a police headscarf, and an initiative by several housing corporations to construct ‘Muslim apartments’ with specifically adapted floor-plans to accommodate the alleged Muslim need for separate ‘private’ (read female) and ‘public’ (read male) living spaces. Such controversial initiatives did not result from pressure from Muslim organizations (and were even opposed by some of them) but they did contribute to a public image of Muslims as a group constantly requiring special provisions. In view of the recent turn against multiculturalism in the Netherlands, one may seriously question whether such well-intentioned (but patronizing) initiatives have really improved intercultural relations in the Netherlands. This pessimistic interpretation is further underlined by the fact that the socioeconomic position of Dutch migrants, and of Muslims in particular, is decidedly worse than in several other European immigration countries (see, e.g. Thränhardt, 2000; Koopmans, 2003; Statham and Koopmans, 2005). Surprisingly, such socioeconomic problems are hardly publicly addressed by ethnic minority or Muslim organizations (see Koopmans et al., 2005). In this light, Dutch multiculturalism may be viewed more sceptically as an opportunity structure that not only channels migrant claims *toward* cultural group demands, but at the same time *away from* the pressing socioeconomic disadvantages that face many Muslims.

In contrast, we found British Muslims mobilizing assertively, sometimes violently, and often in ways that directly target the workings and principles of state authorities. The state remains unwilling to grant rights to Muslims, fearing that their associational activities cannot easily be included within its secular integration formula, not least because they aim to promote a political role for the Islamic faith. Indeed, we find incommensurable demands by Muslims that appear to make such fears well founded. To be

fair, we also find a significant number of group demands that are made *within* the race relations framework and that would be relatively easily accommodated if Muslims were categorized as an 'ethno-religion' in law. Nonetheless, we consider that it is unlikely the British multiracial politics will be able to accommodate Islam without ongoing conflicts, mostly in public debates, at times on the streets, and on occasion through acts of violence.

French Muslims are more reactive in mobilizing their demands on the state and their advocacy for religious recognition is more defensive. Religious demands tend to be acculturative, such as those by the Rector of the Paris Mosque, asking for little more than accommodation for Islam within the state's organization of religious communities. In several examples, Muslims drew on Republican *laïcité* as the legitimating basis for their demands. The headscarf cases also demonstrated that the institutional conflicts about the place of Islam are often brought forward by the state asserting its *laïcité*. Attempts to turn 'Muslims into Frenchmen' have shaped a sort of French Islam, but so far this is not a pacified Islam able to disappear under the mask of common citizenship. The risk is that too strong assimilative pressures may in the future push migrant groups away from their presently still strong identification with the French political culture, and into a choice between a neutered or a politicized Islam.

We tested three national approaches and found each problematic in different ways. This gloomy conclusion arises in part from the fact that Islam cannot simply be confined to privatized religious faith, but advances into the public realm of politics where the state's authority and civic citizenship obligations reign supreme. However, immigration bringing new religious groups into a community is hardly without historical precedent. Large-scale immigration of Irish Catholics and Jews from Eastern Europe to Britain, were distinct religious and ethnic groups who over time were incorporated into the national community. Accommodating Islam will be problematic, though it is perhaps better to have political conflicts over being part of a national community, than to have minorities who see themselves apart from civil society. One possibility is the emergence in time of more 'domesticated' national forms of Islam, whose demands are more easily included within existing frameworks, and whose believers share more of the core values and worldviews of the majority public. Alternatively, failure by political institutions to recognize and include the specificities of Islam may lead to grievances, turning future generations either towards political ideologies which challenge the West, or a life of alienation and anomie.

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Notes

- 1 This definition is similar to Kymlicka and Norman's 'minority rights' (2000, p. 2). It differs because they require a state's recognition of migrants' identities and a need to be 'intentional'. Against this, group-specific state provisions are often an extension (even reluctant) of existing arrangements, by default, to migrant groups. Our definition is less normative not requiring the state's (good) 'intention'.
- 2 Substantive overviews are Hiro (1991) for Britain; Entzinger (2003) for the Netherlands; and Ireland (1994) for France. Detailed information on Muslims appears in Laurence (2003) for France, Rath et al. (1999) for the Netherlands, and Statham (2003) for Britain.
- 3 Such cases were coded for both identities, thus the categories in Table 2 add up to more than 100 percent.
- 4 After the dominance of Muslim identifications, we see at a secondary level evidence for national differences, e.g. more racial identifications in Britain, more ethnic and national identities in the Netherlands, and more status ones in France. Another group-specific exception deserving comment is the Harki who make one-fifth (20.4%) of group demands in France. The Harki are Muslims, though – unlike other Muslim groups – this is not their primary identity for group demands. Such exceptional group behaviour is explained by national context. The French state extends special recognition to this group who are descendants of soldiers who fought for *la patrie* in colonial wars against Algeria and immigrated to the Motherland after defeat. Organizations like the aptly named 'Justice pour les Harkis' use what they perceive as a special recognized group status as a legitimating resource to make demands that set them apart from other migrant groups.
- 5 In the Dutch case, this is not an exceptional group rights demand because it is a right that is already extended, for example, to the Reformed and Calvinist denominations of Dutch Protestants.
- 6 Asked whether they thought of themselves as British, 66 percent Pakistani and 60 percent Bangladeshi minorities (predominantly Muslim) answered affirmatively, compared to 62 percent Indian (predominantly Hindu) and 64 percent Caribbean (Modood et al., 1997: 329).

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